

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
7:20-CR-167-M-5

UNITED STATES OF AMERICA
v.
JOSEPH MAURINO

**MOTION TO CONTINUE
ARRAIGNMENT AND EXTEND
MOTIONS DEADLINES**

NOW COMES the Defendant and moves for a continuance of his Arraignment from the January 2023 Term of Court to the March 2023 Term of Court and to extend or re-open the pre-trial motions deadlines in this matter. In support of this motion, the undersigned shows to the Court the following:

1. The Defendant was charged in a Third Superseding Indictment returned on August 18, 2021 with violation of 18 U.S.C. § 371 (conspiracy, object being to further civil disorder) in Count I and 18 U.S.C. § 1366(a) (conspiracy to damage the property of an energy facility) in Count V.
2. The parties are in negotiations regarding a potential resolution to this case short of trial; additional time is needed for approval of a potential plea offer, and so that the parties can conclude negotiations.
3. The parties have spoken as recently as this week about concluding this case and are hopeful that a resolution will be finalized at a February date.
4. The Defendant understands that the delay occasioned by this motion would be excludable from Speedy Trial Act computations.

5. The Government has been consulted and consents to this continuance and does not oppose the Motions deadline being reopened for the Defense in the event that a non-trial disposition is not agreed upon.

WHEREFORE, the Defendant respectfully moves this Court to continue the Defendant's Arraignment until the March 2023 Term of Court and to reset the pre-trial motions deadline to February 13, 2023, for the Defense and February 27, 2023, for the Government's response.

This the 9th day of December 2022.

/s/ Damon Chetson
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was served upon all parties to this action as identified in the Notice of Electronic Filing generated by this filing by electronically filing the foregoing with the Clerk of Court using the CM/ECF system.

Ms. Barbara Kocher
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Date: December 6, 2022.

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